

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 00-101

Respondent: Arthur Silvia

Title: Director

REQUEST: AT&T Communications of New England, Set #2

DATED: January 22, 2001

ITEM: ATT 2-1 Please refer to Section B, Tab 1, page 1 of Verizon's October 2, 2000 Sixth Annual Price Cap Compliance Filing ("Filing"). With respect to each of the residence service offerings listed - Sound Deal, Sensible Minutes, Local Package, Bay State, Metropolitan/Bay State Metropolitan, please identify from your Section C, Tab 1, and reference by section and page each and every specific rate element associated with each of the services.

REPLY: Section B, Tab 1 specified services and related rates are further referenced in Section C, Tab 1:

Sound Deal, page 48 (also page 51 of Attachment 2 in AT&T 1-2)

Sensible Minutes, page 41 (also page 43 of Attachment 2 in AT&T 1-2)

Local Package, page 48 (also page 51 of Attachment 2 in AT&T 1-2)

Bay State, page 28 (also page 32 of Attachment 2 in AT&T 1-2)

Metropolitan/Bay State Metropolitan, page 28 (also page 32 of Attachment 2 in AT&T 1-2)

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 00-101

Respondent: Arthur Silvia

Title: Director

REQUEST: AT&T Communications of New England, Set #2

DATED: January 22, 2001

ITEM: ATT 2-2 Please refer to Section B, Tab 1, page 2 of Verizon's October 2, 2000 Sixth Annual Price Cap Compliance Filing ("Filing"). With respect to the Sound Deal service offering that became effective on September 12, 1999, please provide the following:

- a. Volumes in terms of (I) number customers that signed up to the offer and (ii) minutes of use realized, from September 12, 1999 to December 31, 1999.
- b. Volumes in terms of (I) number customers that signed up to the offer and (ii) minutes of use realized, from January 1, 2000 to December 31, 2000.
- c. Forecasted volumes in terms of (i) number of customers Verizon expects to sign up in the period January 1, 2001 to December 31, 2001 and (ii) minutes of use Verizon expects to realize from January 1, 2001 to December 31, 2001.
- d. With reference to your response in (a) and (b), what percent of Verizon's customer base in MA does this represent?
- e. With reference to your response in (c), what percent of Verizon's customer base in MA does this represent?

REPLY: Verizon MA does not track the data requested. Verizon MA tracks the number of retail subscribers that are in-service and the number of conversation minutes of use by those customers.

- a. The number of in-service retail lines as of December 31, 1999, was

6,489. The retail toll conversation minutes of use for the month of December 1999, was 1,601,000. Data includes both Eastern and Western Massachusetts LATAs.

-2-

REPLY: ATT 2-2
(cont'd)

- b. The number of in-service retail lines as of December 31, 2000, was 32,388. The retail conversation minutes of use for the month of December 2000, was 18,642,000. Data includes both Eastern and Western Massachusetts LATAs.
- c. Verizon MA objects to this request on the ground that it is not reasonably calculated to lead to the discovery of information relevant to any issue in this proceeding. Without waiving its objection, the Company states that the requested data is not available.
- d. Verizon MA objects to this request on the ground that it is not reasonably calculated to lead to the discovery of information relevant to any issue in this proceeding. Without waiving its objection, the Company states the following: (a) SoundDeal lines represent 0.2% of the consumer lines in-service in Massachusetts, as of December 31, 1999; and (b) SoundDeal lines represent 1.1% of the consumer lines in-service in Massachusetts, as of December 31, 2000.
- e. Verizon MA objects to this request on the ground that it is not reasonably calculated to lead to the discovery of information relevant to any issue in this proceeding. Without waiving its objection, the Company states that the requested data is not available.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 00-101

Respondent: Arthur Silvia

Title: Director

REQUEST: AT&T Communications of New England, Set #2

DATED: January 22, 2001

ITEM: ATT 2-3 Please refer to Section B, Tab 1, page 2 of Verizon's October 2, 2000 Sixth Annual Price Cap Compliance Filing ("Filing"). With respect to the Sensible Minute Plan service offering that became effective on December 23, 1999, please provide the following:

- a. Volumes in terms of (i) number customers that signed up to the offer and (ii) minutes of use realized, from December 23, 1999 to December 31, 1999.
- b. Volumes in terms of (i) number customers that signed up to the offer and (ii) minutes of use realized, from January 1, 2000 to December 31, 2000.
- c. Forecasted volumes in terms of (i) number of customers Verizon expects to sign up in the period January 1, 2001 to December 31, 2001 and (ii) minutes of use Verizon expects to realize from January 1, 2001 to December 31, 2001.
- d. With reference to your response in (a) and (b), what percent of Verizon's customer base in MA does this represent?
- e. With reference to your response in (c), what percent of Verizon's customer base in MA does this represent?

REPLY: Verizon MA does not track the data requested. Verizon MA tracks the number of retail subscribers that are in-service and the number of conversation minutes of use by those customers.

- a. The Sensible Minute tariff was not effective until December 23, 1999. The data requested for the first nine days that the tariff was effective is not available.

-2-

REPLY: ATT 2-3
(cont'd)

- b. The number of in-service retail lines as of December 31, 2000, was 230,177. The retail toll conversation minutes of use for the month of December 2000, was 16,494,000. Data includes both Eastern and Western Massachusetts LATAs.
- c. Verizon MA objects to this request on the ground that it is not reasonably calculated to lead to the discovery of information relevant to any issue in this proceeding. Without waiving its objection, the Company states that the requested data is not available.
- d. Verizon MA objects to this request on the ground that it is not reasonably calculated to lead to the discovery of information relevant to any issue in this proceeding. Without waiving its objection, the Company states the following: (a) see the response to ATT 2-3(a) above; and (b) Sensible Minute lines represent 7.6% of the consumer lines in-service in Massachusetts, as of December 31, 2000.
- e. Verizon MA objects to this request on the ground that it is not reasonably calculated to lead to the discovery of information relevant to any issue in this proceeding. Without waiving its objection, the Company states that the requested data is not available.

VZ# 21

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 00-101

Respondent: Arthur Silvia

Title: Director

REQUEST: AT&T Communications of New England, Set #2

DATED: January 22, 2001

ITEM: ATT 2-4 Please refer to Section B, Tab 1, page 3 of Verizon's October 2, 2000 Sixth Annual Price Cap Compliance Filing ("Filing"). With respect to the Local Package service offering that became effective on February 13, 2000, please provide the following:

- a. Volumes in terms of (i) number customers that signed up to the offer and (ii) minutes of use realized, from February 13, 2000 to December 31, 2000.
- b. Forecasted volumes in terms of (i) number of customers Verizon expects to sign up in the period January 1, 2001 to December 31, 2001 and (ii) minutes of use Verizon expects to realize from January 1, 2001 to December 31, 2001.
- c. With reference to your response in (a), what percent of Verizon's customer base in MA does this represent?
- d. With reference to your response in (b), what percent of Verizon's customer base in MA does this represent?

REPLY: Verizon MA does not track the data requested. Verizon MA tracks the number of retail subscribers that are in-service.

- a. The number of in-service retail lines as of December 31, 2000, was 88,855. Local usage is not measured and toll usage is not part of this service offering, therefore, minutes of use are not available. Data includes both Eastern and Western Massachusetts LATAs.
- b. Verizon MA objects to this request on the ground that it is not reasonably calculated to lead to the discovery of information relevant to any issue in this proceeding. Without waiving its objection, the

Company states that the requested data is not available.

-2-

REPLY: ATT 2-4
(cont'd)

- c. Verizon MA objects to this request on the ground that it is not reasonably calculated to lead to the discovery of information relevant to any issue in this proceeding. Without waiving its objection, the Company states that Local Package lines represent 3.1% of the consumer lines in-service in Massachusetts, as of December 31, 2000.
- d. Verizon MA objects to this request on the ground that it is not reasonably calculated to lead to the discovery of information relevant to any issue in this proceeding. Without waiving its objection, the Company states that the requested data is not available.

VZ# 22

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 00-101

Respondent: Arthur Silvia

Title: Director

REQUEST: AT&T Communications of New England, Set #2

DATED: January 22, 2001

ITEM: ATT 2-5 Please refer to Section B, Tab 1, page 3 of Verizon's October 2, 2000 Sixth Annual Price Cap Compliance Filing ("Filing"). With respect to the Bay State East-Met, Bay State East non-Met Overtime Minutes, please provide the following:

- a. Volumes in terms of (i) number customers that signed up to the offer and (ii) minutes of use realized, from January 1, 2000 to December 31, 2000.
- b. Forecasted volumes in terms of (i) number of customers Verizon expects to sign up in the period January 1, 2001 to December 31, 2001 and (ii) minutes of use Verizon expects to realize from January 1, 2001 to December 31, 2001.

REPLY: Verizon MA does not track the data requested. Verizon MA tracks the number of retail subscribers that are in-service and the total number of retail toll conversation minutes of use by those customers.

- a. The number of in-service retail lines as of December 31, 2000, was 96,972 for Bay State East Met and 259,654 for Bay State East non-Met. The total number of retail toll conversation minutes of use for the month of December 2000, was 8,570,800 for Bay State East Met and 36,845,600 for Bay State East Non-Met.
- b. Verizon MA objects to this request on the ground that it is not reasonably calculated to lead to the discovery of information relevant to any issue in this proceeding. Without waiving its objection, the

Company states that the requested data is not available.

VZ# 23

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY
COMMONWEALTH OF MASSACHUSETTS

D.T.E. 00-101

Respondent: Arthur Silvia

Title: Director

REQUEST: AT&T Communications of New England, Set #2

DATED: January 22, 2001

ITEM: ATT 2-6 Please refer to Section B, Tab 1, page 3 of Verizon's October 2, 2000 Sixth Annual Price Cap Compliance Filing ("Filing"). With respect to the Metropolitan and Bay State Metropolitan Service offering, please provide the following:

- a. Volumes in terms of (i) number customers that signed up to the offer and (ii) minutes of use realized, from January 1, 2000 to December 31, 2000.
- b. Forecasted volumes in terms of (i) number of customers Verizon expects to sign up in the period January 1, 2001 to December 31, 2001 and (ii) minutes of use Verizon expects to realize from January 1, 2001 to December 31, 2001.

REPLY: Verizon MA does not track the data requested. Verizon MA tracks the number of retail subscribers that are in-service.

- a. The number of in-service retail lines as of December 31, 2000, was 299,082 for Metropolitan Service. *See* Verizon MA's Reply to ATT 2-5 for the number of in-service retail lines for Bay State East Met. Metropolitan Service is not separately identified from MTS service for retail conversation minutes of use. For the month of December 2000, *see* Verizon MA's Reply to ATT 2-5 for Bay State East Met minutes of use.
- b. Verizon MA objects to this request on the ground that it is not

reasonably calculated to lead to the discovery of information relevant to any issue in this proceeding. Without waiving its objection, the Company states that the requested data is not available.

VZ# 24

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 00-101

Respondent: Arthur Silvia

Title: Director

REQUEST: AT&T Communications of New England, Set #2

DATED: January 22, 2001

ITEM: ATT 2-7 With respect to Verizon's Local Package referred to in question 4 above, please provide number of customers signed up at the end of 2000 for the three categories of pricing plans for Local Package Prime Feature Package, i.e. the number of customers subscribing to (i) month-by-month service plan; (ii) up to 36 months service plan and (iii) up to 60 months service plan.

REPLY: Verizon MA does not offer Local Package Prime Feature Package in Massachusetts.

VZ# 25

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 00-101

Respondent: Arthur Silvia

Title: Director

REQUEST: AT&T Communications of New England, Set #2

DATED: January 22, 2001

ITEM: ATT 2-8 Please refer to Section B, Tab 1, page 2 of Verizon's October 2, 2000 Sixth Annual Price Cap Compliance Filing ("Filing"). With respect to the Phonesmart Service Features for Residence customers, please provide the following:

- a. Volumes in terms of number of customers that signed up for each feature listed and, from January 1, 2000 to December 31, 2000.
- b. Forecasted volumes in terms of number of customers Verizon expects to sign up in the period January 1, 2001 to December 31, 2001.

REPLY: Verizon MA does not track the data requested. Verizon MA tracks the number of retail features in-service.

- a. Following are in-service quantities as of December 31, 2000:

Caller ID	62,049
Caller ID with name	307,548
Call Manager	9
Call Manager with name	361
Call Waiting ID	361
Call Waiting ID with name	204,036

- b. Verizon MA objects to this request on the ground that it is not reasonably calculated to lead to the discovery of information relevant to any issue in this proceeding. Without waiving its objection, the Company states that the requested data is not available.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 00-101

Respondent: Arthur Silvia

Title: Director

REQUEST: AT&T Communications of New England, Set #2

DATED: January 22, 2001

ITEM: ATT 2-9 Please refer to Section B, Tab 1, page 4 of Verizon's October 2, 2000 Sixth Annual Price Cap Compliance Filing ("Filing"). With respect to the Phonesmart Service Features for Business customers, please provide the following:

- a. Volumes in terms of number of customers that signed up for each feature listed and, from January 1, 2000 to December 31, 2000.
- b. Forecasted volumes in terms of number of customers Verizon expects to sign up in the period January 1, 2001 to December 31, 2001.

REPLY: Verizon MA does not track the data requested. Verizon MA tracks the number of retail features in-service.

- a. Following are in-service quantities as of December 31, 2000:

Caller ID	8,328
Caller ID with name	22,000
Call Manager	3
Call Manager with name	40
Call Waiting ID	63
Call Waiting ID with name	4,755

- b. Verizon MA objects to this request on the ground that it is not reasonably calculated to lead to the discovery of information relevant to any issue in this proceeding. Without waiving its objection, the Company states that the requested data is not available.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 00-101

Respondent: Arthur Silvia

Title: Director

REQUEST: AT&T Communications of New England, Set #2

DATED: January 22, 2001

ITEM: ATT 2-10 With regard to the ValuePack package that is part of the Sound Deal offering, please answer the following:

- a. Since the introduction of the ValuePack package what has been the actual volume in terms of the number of customers signed up for the first 12 months of the service?
- b. What is Verizon's forecast for the volume of customers it expects to sign up for the next 12 months of service?
- c. With respect to the response in both parts, please indicate the percentage of Verizon's local services customers that this represents.

REPLY: Verizon MA does not track the data requested. Verizon MA tracks the number of retail subscribers that are in-service.

- a. ValuePack is a separate service that is unrelated to SoundDeal. SoundDeal offers features that are the same as ValuePack's, however, they are reported separately. The in-service number of customers for ValuePack as of December 31, 2000 was 39,075.
- b. Verizon MA objects to this request on the ground that it is not reasonably calculated to lead to the discovery of information relevant to any issue in this proceeding. Without waiving its objection, the Company states that the requested data is not available.
- c. Verizon MA objects to this request on the ground that it is not reasonably calculated to lead to the discovery of information relevant to any issue in this proceeding. Without waiving its objection, the Company states that ValuePack is included on 3.1% of the consumer lines in-service in Massachusetts, as of December 31, 2000.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 00-101

Respondent: Arthur Silvia

Title: Director

REQUEST: AT&T Communications of New England, Set #2

DATED: January 22, 2001

ITEM: ATT 2-11 Please refer to Section B, Tab 1, page 5 of Verizon's October 2, 2000 Sixth Annual Price Cap Compliance Filing ("Filing"). With respect to the Access, please provide the following:

- a. Average cost of access, month-by-month, from June through and including November 1999.
- b. Average cost of access, month-by-month, from December 1999 to and including June 2000.
- c. Revenues associated with the entrance facilities referred to in the Price Cap filing, month by month, from June through and including November 1999.
- d. Revenues associated with the entrance facilities referred to in the Price Cap filing, month by month, from December 1999 to June 2000.
- e. Revenues associated with the direct trunked transport referred to in the Price Cap filing, month by month, from June through and including November 1999.
- f. Revenues associated with the direct trunked transport referred to in the Price Cap filing, month by month, from December 1999 to June 2000.

REPLY: a-f. Verizon MA objects to these requests on the ground that they are not reasonably calculated to lead to the discovery of information relevant to any issue in this proceeding.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 00-101

Respondent: Arthur Silvia

Title: Director

REQUEST: AT&T Communications of New England, Set #2

DATED: January 22, 2001

ITEM: ATT 2-12 Please refer to Section C, Tab 1, pages 1-83 of Verizon's October 2, 2000 Filing.

- a. Please provide actual quantities sold for each service for which rate elements are listed, for each of the last three years.
- b. Please provide a current three year forecast for each of the services listed in response to subpart a.

REPLY:

- a. As noted earlier, Verizon MA tracks "in service" quantities. The Company does not track quantities sold as requested in this interrogatory. The quantities "in service" for the last three years are available in the Fourth, Fifth and Sixth Annual Price Cap Compliance Filings to which AT&T was a party.
- b. Verizon MA objects to this request on the ground that it is not reasonably calculated to lead to the discovery of information relevant to any issue in this proceeding.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 00-101

Respondent: Arthur Silvia

Title: Director

REQUEST: AT&T Communications of New England, Set #2

DATED: January 22, 2001

ITEM: ATT 2-13 With respect to the excel file titled, "VZ Price Floor Calc 1-10.xls", please provide the source of the revenue figures shown on line 1 for pages, including at a minimum all rates and quantities that develop the revenues.

REPLY: Please see Attachments 1, 2 and 3.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 00-101

Respondent: Arthur Silvia

Title: Director

REQUEST: AT&T Communications of New England, Set #2

DATED: January 22, 2001

ITEM: ATT 2-14 With respect to the excel file titled, "VZ Price Floor Calc 1-10.xls", please provide the source of the minutes figures shown on line 3 for pages and define all services that are included in the count of minutes.

REPLY: Please see the Attachments to ATT 2-13.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 00-101

Respondent: Arthur Silvia

Title: Director

REQUEST: AT&T Communications of New England, Set #2

DATED: January 22, 2001

ITEM: ATT 2-15 For each service for which Verizon proposes rate reductions, please provide the total cost of UNEs that a CLEC would have to purchase from Verizon in order to provide that same service to the CLEC's own retail customers.

REPLY: Verizon MA objects to this request on the ground that it is not reasonably calculated to lead to the discovery of information relevant to any issue in this proceeding.